

Exhibit “E”

1 Q Okay. Prior to you filing a lawsuit, were you
2 familiar with the provisions of the Fair Debt Collection
3 Practices Act?

4 A Yes.

5 Q How so?

6 A I was doing some online classes with a guy
7 named Vance, and he was teaching me.

8 Q A guy named Vance?

9 A Yes.

10 Q Is it -- is -- who's Vance? Is that a lawyer?

11 A No.

12 Q Who -- is it an online service?

13 A Yes.

14 Q What's -- do you remember the name of the
15 online service that you signed up for?

16 A It's not a -- I met him through his IG,
17 Instagram account.

18 Q Okay. So you did something through an
19 Instagram where they -- what -- how -- what's the
20 seminar about?

21 A They're just telling you how to remove things
22 off your credit report.

23 Q Okay. Does that get -- does that report in
24 essence advise you to file a lawsuit against the
25 creditor and make certain allegations in hopes that they

1 A I've taken the courses, like I said, with
2 Vance. He was teaching me about my credit scores,
3 credit reported -- agencies reporting on your credit and
4 how it affects you.

5 Q Do you consider Vance to be a credit repair
6 organization?

7 A Yes.

8 Q Is he based in Georgia?

9 A No.

10 Q Where's he based out of?

11 A He's based out of Vermont.

12 Q Where?

13 A Vermont.

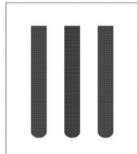
14 Q Okay. And it -- is this a, like a YouTube or
15 a seminar that you paid for?

16 A Yes, it's a seminar I paid for. We do Zoom
17 meetings, and sometimes we do actual phone
18 conversations.

19 Q Okay. So sometimes you do a Zoom and you pay
20 for the service. And during that seminar or that class,
21 you were instructed on the provisions of the Fair Debt
22 Collection Practices Act?

23 A Yes.

24 Q Okay. And were you instructed on the
25 provisions of the Fair Credit Reporting Act?



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1 A Yes.

2 Q Do you see below here on your account -- this
3 is as of March 22, 2022, correct?

4 A Yes.

5 Q And your credit score is 505. You see that?

6 A Yes.

7 Q Okay. Would you consider 505 to be a low
8 score or a high score?

9 A A low score.

10 Q Okay. And then it has on here top key factors
11 that adversely affected your credit score. Do you see
12 that?

13 A I'm there.

14 Q Okay. Do you see the first one -- the first
15 one that's listed is you have too few credit accounts.
16 Do you see that?

17 A Yes.

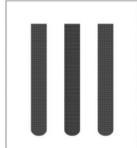
18 Q That doesn't have anything to do with ARS,
19 does it?

20 A No.

21 Q And it says also you have either too few loans
22 or too many loans with recent delinquencies. You see
23 that?

24 A Yes.

25 Q In that regard, that doesn't have anything to



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1 do with ARS, does it?

2 A Well, I'm not sure if they consider you're
3 reporting a loan.

4 Q Well, is a -- is a medical debt a loan?

5 A No.

6 Q Okay. So this says loans specifically. Did
7 you take out a loan with ARS or a medical entity?

8 A No.

9 Q Okay. So having either too few loans or too
10 many loans with recent delinquencies was a reason for
11 your denial or adversely affecting the credit score,
12 right?

13 A Yes.

14 Q Do you have any loans?

15 A No.

16 Q Okay. The next one is newest delinquency
17 derogatory payment statuses on your account is too
18 recent. You see that?

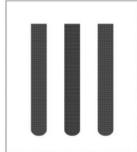
19 A Yes.

20 Q In looking at your credit report, it looks
21 like that these accounts were reported back in 2020,
22 correct? To your bureau?

23 A Correct.

24 Q Okay.

25 A Yes.



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1 Q That's not -- that's two years ago, right?

2 A Yes.

3 Q Do you have any derogatory items on your
4 credit bureau that is earlier than two years?

5 A No. Only the ARS collections.

6 Q Have you ever heard of Paramount Recovery
7 Systems?

8 A No.

9 Q What is Drive Time Bridge Crest?

10 A That's an account with Drive Time when I had a
11 -- a car in Miami.

12 Q Okay. And in that, are you -- is it with your
13 current car?

14 A No.

15 Q That's a previous car?

16 A Yes.

17 Q Did you pay that car loan off?

18 A Yes.

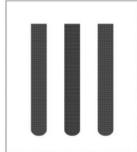
19 Q Did you have an accident?

20 A Yes.

21 Q Okay. So your balance was paid by insurance?

22 A Yes.

23 Q Okay. There's a company called on your credit
24 bureau on page 6 of 10 called Paramount Recovery
25 Systems. You remember seeing that? You remember seeing



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1 that?

2 A No.

3 Q Let's see here. I'm going to share this. I'm
4 going to mark this as -- where are we at, 4?

5 (EXHIBIT 4 MARKED FOR IDENTIFICATION)

6 A Yes.

7 Q Okay. Can you see that Ms. Macajoux?

8 A Yes.

9 Q It says Paramount Recovery Systems at the top?

10 A Yes.

11 Q Okay. This account is in collections as well?

12 A Yes.

13 Q Okay. Do you believe that the entry of this
14 also affects your credit score?

15 A Yes.

16 Q This has nothing to do with ARS, does it?

17 A No.

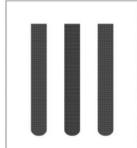
18 Q Okay. When you were a -- the document that I
19 showed you was the -- in regards to the apartment
20 complex, do you remember that --

21 A Uh-huh -- yes.

22 Q -- the denial letter? Was that an apartment
23 that you were seeking with Mr. Nelson?

24 A Yes.

25 Q Okay. Also, on this document, you prepared an



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1 unsecured credit card.

2 Q So if these accounts were removed from your
3 credit bureau, do you have any idea what your credit
4 score would be?

5 A At least a 650.

6 Q How do you know that?

7 A Because once things removed off my account,
8 they go up by at least 30 to 50 points.

9 Q How do you know that?

10 A Because I've had items removed off my report.

11 Q Through litigation?

12 A No.

13 Q From what?

14 A Writing letters like I did to you before it
15 got to this point.

16 Q Okay. Other -- so you're not claiming
17 identity theft in this case in these bills, right?

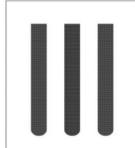
18 A No.

19 Q You're just asserting that you had the medical
20 services, but for some reason you shouldn't have to pay
21 them; is that accurate?

22 A Yeah.

23 Q Okay. But you can't give me a reason as to
24 why you shouldn't have to pay them.

25 A -- I shouldn't have to pay them. I just feel



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1 A The credit bureaus because they're the ones
2 that's being reported. So it's a mishap on Inphynet's
3 part and the credit reporting agency part.

4 Q But if Inphynet has verified that this balance
5 on these letters are accurate and the bureau gave you
6 wrong information, who would be the most accurate?

7 A Repeat that?

8 Q Sure. So you have a letter here that's dated
9 in June of 2021 that shows you balances that Inphynet
10 has verified as being accurate, okay?

11 A Yes.

12 Q Right?

13 A Yes.

14 Q So Inphynet would probably know what their
15 balances are because they're the creditor, right?

16 A Yes.

17 Q Would you agree with me that that would be
18 more accurate than Experian?

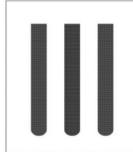
19 A Yes.

20 Q Because they're the original creditor.

21 They're the one that has the best knowledge, because
22 they know exactly how much you owe them, right?

23 A Yes.

24 Q Okay. So if they -- if Experian -- if we were
25 to demonstrate that the information from Inphynet was



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1 accurately conveyed to the bureaus, but the
2 representative at Experian gave you wrong information,
3 that wouldn't be ARS's fault, would it?

4 A No.

5 Q Okay. And the only source that you believe
6 that this information is inaccurate is because of what
7 Experian's representative told you over the phone on
8 these audio recordings, right?

9 A Yes.

10 Q Okay. But if I were to look at your credit
11 bureau, the amounts that are reflected on these amounts
12 is accurately reported on your bureau, right?

13 A If that's what Inphynet Broward has provided
14 for you, yes.

15 Q Okay. All right. Your letter or your
16 statement of your -- of truthful -- affidavit of
17 truthfulness. Let me go back to it, make sure I can
18 find it. Let me find it. I'm just looking for your
19 right account. Let me see if I -- oh, here it is. Okay.
20 Can you see that on the screen now?

21 A Yes.

22 Q Okay. Now, number 6 says, "Fact, Account
23 Resolution Services is violate Affiant pursuant to
24 1692D2 by using obscene language to harass and abuse the
25 Affiant." You see that?



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1 A Yes.

2 Q That's -- that was also false to a federal
3 agency, right?

4 A Yes.

5 Q Okay. And you said, "I, Kathy Macajoux" --
6 you see it right there? See it right there?

7 A Yes.

8 Q That's your signature?

9 A Yes.

10 Q It says, "I, Kathy Macajoux, under my
11 unlimited liability and commercial oath, proceeding in
12 good faith and being of sound mind, having firsthand
13 knowledge, state and affirm that the facts contain
14 herein are true, correct, complete and not misleading
15 under the penalty of perjury." You see that?

16 A Yes.

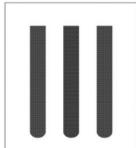
17 Q And you would agree with me that statement --
18 paragraph number 6, is false, incomplete, and
19 misleading?

20 A Yes.

21 Q I'm going to show you a letter that you -- oh,
22 the next one. Do you see that? August 9th? We talked
23 about this a little bit?

24 A Yes.

25 Q You see where it says, "notice and demand to



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1 cease and desist"?

2 A Yes.

3 Q Did you ever receive any communications from
4 ARS after August 9, 2021?

5 A Have I received any letters, like reporting
6 letters?

7 Q Letters, phone calls, any communications after
8 you sent them a cease and desist?

9 A No.

10 Q Okay. So you asked them to do three things.
11 Do you see that?

12 A Yes.

13 Q Number 1 is "Terminate all further collection
14 efforts." You see that?

15 A Yes.

16 Q Did they do that?

17 A No.

18 Q What did they do after August 9th?

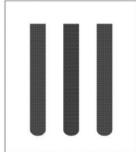
19 A I mean, yes. Sorry, yes. Sorry, yes.

20 Q Okay. The second thing was "Remove all
21 alleged accounts from the consumer reporting bureaus."
22 You see that?

23 A Yes.

24 Q They didn't do that, right?

25 A No.



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1 Q You weren't aware of that?

2 A No, I was not.

3 Q Your complaint alleges -- I'll show you the
4 end of your complaint here. Can you see that document?

5 A Yes.

6 Q Yes? I'm sorry.

7 A Yes, I see it.

8 Q Okay. When you look at Section B -- let me
9 see if I can highlight it for you.

10 A I could see it.

11 Q Okay. See where it says, "actual damages"?

12 A Yes.

13 Q What actual damages have you suffered in this
14 case?

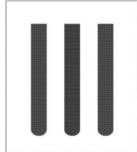
15 A Like I said, it's preventing me from getting
16 an apartment and to actually receive a unsecured credit
17 card.

18 Q Yeah. I know that it's preventing you, but
19 what -- I mean actual damages is like what has been
20 incurred? Have you lost any money? Have you had to pay
21 more than you thought you'd have to pay? What -- what's
22 the deal with that?

23 A No, I didn't have to pay any money.

24 Q Have you lost any money?

25 A No.



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1 Q Okay. So you've suffered -- other than the
2 filing fee, you suffered no actual, like out-of-pocket
3 expenses, right?

4 A Right.

5 Q You haven't had to like, seek medical
6 attention for emotional distress or anything like that,
7 have you?

8 A No.

9 Q Okay. And you're not asserting emotional
10 distress or anything like that in this lawsuit, are you?

11 A No, I'm not.

12 Q Okay. Does Vance have a -- like a website or
13 something on the -- that I can Google to see what his
14 program's like?

15 A No.

16 Q How did -- how did you find out about it?

17 That's Instagram?

18 A Yes.

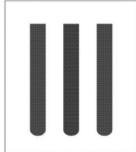
19 Q Okay. What's the title of his seminar?

20 A Just Credit Reports.

21 Q Like, so how did you -- did you go through the
22 -- through social media to sign up for the program?

23 A Yes.

24 Q And when you -- when you sign in for the
25 program, do you go to like a website or a -- or a



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1 internet site to log in?

2 A I told you, through Zoom.

3 Q Through Zoom?

4 A Yes.

5 Q How do you make your payments to him? Do you
6 make payments directly to like a website or a portal or
7 anything?

8 A I make payments directly to Vance.

9 Q To Vance?

10 A Yes.

11 Q Is that like through like -- what do you call
12 it?

13 A Like Cash App or Zelle.

14 Q Cash App, some type of Zelle, or some kind of
15 electronic transfer?

16 A Yes.

17 Q Okay. And then you do that every month?

18 A Yes.

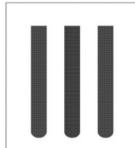
19 Q And how much do you pay a month?

20 A 1 -- 150.

21 Q You pay \$150 a month to participate in his
22 credit cleansing issues?

23 A Yes.

24 MR. KOHLMYER: Okay. That's all I have. Ms.
25 Macajoux, you have the ability to read your



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